

HIGHLY SENSITIVE DOCUMENT

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

HSD

VLADISLAV KLYUSHIN,
a/k/a VLADISLAV KLIUSHIN,
IVAN ERMakov,
a/k/a IVAN YERMAKOV,
and
NIKOLAI RUMIANTCEV,
a/k/a NIKOLAY RUMYANTSEV,

21-CR-10104

DOCKETED

Defendants.

MOTION TO SEAL AND TO DESIGNATE AS HIGHLY SENSITIVE DOCUMENTS

The United States of America respectfully moves this Court to:

1. seal the indictment, arrest warrant, this motion, any ruling on this motion, and all related orders and paperwork until further order of this Court, except that the government may disclose the indictment and arrest warrants as necessary to effectuate the overseas arrest, detention, or extradition of any of the defendants; and
2. designate all of these documents, pursuant to the Court's Standing Order 21-1 (Jan. 26, 2021), as Highly Sensitive Documents that will not reside on the Court's electronic docket.

In support of this motion, the government states that the public disclosure of any of these materials at this juncture could jeopardize the government's ongoing investigation in this case, including its ability to identify and arrest the targets, and that the identity and activities of the defendants create a high risk that the storage of any of these documents on the Court's electronic docket will result in disclosure through unauthorized access to the Court's computer network.

9/10

HIGHLY SENSITIVE DOCUMENT

The United States further moves pursuant to General Order 06-05 that the United States Attorney, through undersigned counsel, be provided copies of all sealed documents which the United States Attorney has filed in this matter.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney

By: /s/Seth B. Kosto

SETH B. KOSTO
Assistant U.S. Attorney

Date: April 6, 2021

MOTION ALLOWED:

Marianne B. Bowler, USM
HONORABLE MARIANNE B. BOWLER
UNITED STATES MAGISTRATE JUDGE

Date: April 6, 2021